

The Honorable Marsha J. Pechman

UNITED STATES DISTRICT COURT
WESTERN DISTRICT OF WASHINGTON
AT SEATTLE

IN RE WASHINGTON MUTUAL, INC.
SECURITIES & ERISA LITIGATION

No. 2:08-md-1919 MJP

IN RE WASHINGTON MUTUAL, INC.
SECURITIES LITIGATION

Lead Case No. C08-387 MJP

This Document Relates to: ALL CASES

**REPLY DECLARATION OF HANNAH ROSS
IN FURTHER SUPPORT OF LEAD PLAINTIFF'S MOTIONS FOR FINAL
APPROVAL OF CLASS ACTION SETTLEMENTS AND APPROVAL OF
PLAN OF ALLOCATION AND LEAD COUNSEL'S MOTION FOR
AN AWARD OF ATTORNEYS' FEES AND LITIGATION EXPENSES**

I, HANNAH ROSS, under the penalty of perjury, declare as follows:

1. I am a partner with the law firm of Bernstein Litowitz Berger & Grossmann LLP ("BLB&G" or "Lead Counsel"). I submit this reply declaration in further support of Lead Plaintiff's motions for final approval of the proposed Settlements and approval of the Plan of Allocation, and Lead Counsel's motion for an award of attorneys' fees and reimbursement of litigation expenses.

2. Attached hereto as Exhibit 1 is a true and correct copy of a letter from Angela L. Marsteiner to the Clerk's Office of the United States District Court for the Western District of Washington, Ronald L. Berenstein, Esq. of Perkins Coie LLP, and myself, dated September 29, 2011. The version of this letter that is attached is the redacted copy that was filed on the Court's docket on October 21, 2011 (ECF No. 896).

5. Attached hereto as Exhibit 4 is a true and correct copy of an email from Eric Jann to the Court, dated October 16, 2011 (ECF No. 894).

I declare under penalty of perjury under the laws of the United States that the foregoing is true and correct. Executed this 25th day of October, 2011, in New York, New York.


Hannah Ross

CERTIFICATE OF SERVICE

I hereby certify that on October 28, 2011, I electronically filed the foregoing and all of its attachments with the Clerk of the Court using the CM/ECF system, which will send notification of such filing to the e-mail addresses on the Court's Electronic Mail Notice list. Additionally, the foregoing and all of its attachments were served by first-class mail on October 28, 2011 on the following:

Ms. Angela L. Marsteiner
83910 Charro Dr.
Indio, CA 92203

Mr. James Newman
49 Park Avenue
Hawthorne, NJ 07506

Ms. Annette Lynes-Meeks
703 Broadmoor Dr.
Mountain Home, AR 72653

And via e-mail on October 28, 2011 on Eric Jann at ericjann@comcast.net.

BERNSTEIN LITOWITZ BERGER &
GROSSMANN LLP

By: /s/ Hannah Ross
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